

December 28, 2017

Dear Rio Grande Forest Supervisor Dan Dallas and Rio Grande National Forest Planning Team:

This letter is in response to the Rio Grande National Forest's (RGNF) Draft Plan (DP) and Draft Environmental Statement (DEIS). Below, we offer a few recommendations for how the RGNF can improve the Draft Plan and Draft Environmental Impact Statement.

I. Continue to increase and enhance Landscape/Habitat and Wildlife Connectivity

We are pleased to see several Special Interest Areas (SIAs) included in Alternative D of the DEIS but are very disappointed by the proposed Plan and strongly believe that these SIAs should be included in the preferred alternative and at the very least, the Rio Grande National Forest (RGNF) should adopt the following SIAs in the final Plan, which would help maintain and restore connectivity in the Upper Rio Grande Watershed: Spruce Hole/ Osier/Toltec Connectivity Special Interest Area, Chama Basin Watershed Protection Special Interest Area, Jim Creek Special Interest Area and Carnero Creek Special Interest Area.

We also request that the RGNF adopt substantive plan components for each SIA to ensure that the values for which they are established are maintained and enhanced over the life of the plan. Our recommended plan components for each SIA are included in this letter. We request that the RGNF analyze these plan components in the FEIS and include them in the final Plan. These Special Interest Areas include over 100,000 acres of recognized landscape designated to promote Wildlife Connectivity, the protection and restoration of native Rio Grande cutthroat trout, and the conservation of wildlife. We also support the inclusion of forest-wide plan direction that would maintain and restore terrestrial and aquatic connectivity.

We appreciate the RGNFs efforts to approach wildlife connectivity holistically in the plan and to incorporate some levels of wildlife habitat protections throughout the Forest. However, just as there are places that are identified and proposed for particular management due to their particular recreation or development values, it is imperative to recognize specific areas that are of particular significance for wildlife habitat connectivity. Protecting these SIAs is not only critical for wildlife conservation and connectivity, but also are critical to providing opportunity to sportsmen and women as well as critical to supporting the regional economy and culture. For example, maintaining premiere wildlife habitat provides exceptional hunting, fishing and other recreational opportunities that are critical to economic livelihood and identity of many communities in southern Colorado and northern New Mexico. For example, according to a study conducted by Colorado Parks and Wildlife on the Economic Contributions of Outdoor Recreation in Colorado: Over 180,000 days were spent hunting alone by residents in Alamosa, Conejos, Mineral, Hinsdale, Archuleta, Rio Grande, Costilla and Saguache Counties in 2013. The average days spent fishing by those who participated was 16.35 in South-central and South-eastern counties.¹

¹ <http://cpw.state.co.us/Documents/Commission/2014/May/ITEM21-2013COEconImpactReport.pdf>

Alamosa, Conejos, Mineral, Hinsdale, Archuleta, Rio Grande, Costilla and Saguache had nearly 28\$ million in Output for Economic Hunting Contributions and created nearly 650 jobs directly related to hunting. South-central Colorado had a total output for fishing of 294\$ million in 2013.

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A. Spruce Hole/Osier/Toltec Special Interest Area

This 36,000-acre area is critical for big game movement from southern Colorado into northern New Mexico. Protecting this movement corridor in the forest plan will ensure core roadless habitat in Colorado that is connected to core habitat in New Mexico. This area is also of critical economic and cultural importance to local communities within Rio Grande, Mineral, Alamosa and Conejos Counties.

The Final Plan should describe the primary values of this area as:

- Wildlife migration and connectivity for large game species, including mule deer, elk, pronghorn, and Rocky Mountain bighorn sheep, as well as carnivores such as Canadian lynx, mountain lions, and black bears. (DEIS at 314).
- High quality wildlife habitat for species of conservation concern and federally protected species, including the boreal owl, peregrine falcon, Brewer's sparrow, flammulated owl, Rio Grande cutthroat trout, Gunnison's prairie dog; Ripley's milkvetch, slender cliffbrake, Plumber's cliff fern, Colorado divide whitlow grass, and flowered gilia; federally protected species such as the Mexican spotted owl, southwestern willow flycatcher, yellow-billed cuckoo, and New Mexico meadow jumping mouse; migratory birds including ferruginous hawks, black swifts, sage sparrows, burrowing owls, Cassin's finches, Grace's warblers, gray vireos, juniper titmouse, Lewis's woodpeckers, loggerhead shrikes, long-billed curlews, mountain plovers, pinyon jays, and Virginia's warblers. (See DEIS at 314.)

Site-specific plan components and management approaches should include:

DESIRED CONDITIONS

- Long-term connectivity and integrity of habitat utilized for fish and wildlife movement through the area is maintained and, where necessary, restored to provide for ecological integrity.
- This SIA is managed for wildlife movement and habitat connectivity and for the enjoyment of the public as they hunt, fish, recreate, study, and observe wildlife. Natural conditions prevail in the area while providing an opportunity for interpretation, education, and research.
- Wildlife habitat connectivity provides an essential ecological condition for supporting viable populations of at-risk species and offers educational and research opportunities.

² <http://cpw.state.co.us/Documents/Commission/2014/May/ITEM21-2013COEconImpactReport.pdf>

- Interpretive signing is used to explain major features of the area and explain protection of sensitive ecosystems.
- Management activities will limit the surface disturbance footprint temporally and spatially to minimize adverse impacts to wildlife.
- The Forest Service in cooperation with permittees, Colorado Department of Transportation, Colorado Department of Parks and Wildlife, and other stakeholders implement projects to reduce and minimize barriers to wildlife movement such as fences and dangerous road crossings.

STANDARDS

- Authorized activities shall be harmonious with the primary values of wildlife movement, habitat connectivity, and habitat condition for at-risk species.
- New permanent roads within the corridor will not be constructed in order to maintain unfragmented habitat for wildlife migration and dispersal.
- Temporary roads will only be constructed if necessary, and with the smallest impact possible, and will be reclaimed and obliterated within one year of the termination of the project for which they were authorized to protect watershed condition, minimize wildlife disturbance, and prevent illegal motorized use.
- New or reconstructed fencing shall allow for wildlife passage and prevent wildlife entrapment, taking into consideration seasonal migration and access to water resources (except where specifically intended to exclude wildlife -- e.g., elk exclosure fence -- and/or to protect human health and safety).
- New rights-of-way for energy development that would negatively impact wildlife, their habitat and its connectivity will not be issued.
- Projects will consider the cumulative impacts of ground-disturbing projects that are occurring or will occur on adjacent lands and will strive to minimize as possible the spatial, temporal, or other design features can mitigate impacts to connectivity.
- The area is not suitable for timber production.
- The area is not suitable for oil and gas leasing with no surface occupancy.

GUIDELINES

- Do not exceed a motorized route density of one mile per square mile generally, or a threshold determined by best available science for specific at-risk species.³

MANAGEMENT APPROACHES

- Where motorized route densities exceed one mile per square mile, develop and implement a strategy to reduce the densities to below this threshold level.
- In coordination with the Colorado Department of Transportation, develop and implement a strategy for mitigating highway related barriers to wildlife movement.
- As possible, augment wildlife values through purchase from willing sellers, exchange, transfer, or donation of additional acreage of crucial wildlife habitat for their migration, movement and dispersal.
- Work with livestock permittees to identify fencing that is not critical for livestock operations. Remove fencing that is not critical for livestock operations and that is impeding wildlife movement. Where possible, modify existing fencing that is not wildlife friendly.

B. Chama Basin Watershed Protection Special Interest Area:

This 17,790-acre area encompasses the headwaters of the Rio Chama. The area has a high potential for oil and gas development so it is important the area is protected in the forest plan. This area is of critical economic and cultural importance to local communities within Rio Grande, Mineral, Alamosa and Conejos Counties. This area is of critical due to the close proximity and cross border collaboration with the Carson NF, New Mexico Department of Game and Fish, and Tribal Communities.

Site-specific plan components and management approaches should include:

DESIRED CONDITIONS

- Long-term connectivity and integrity of habitat utilized for fish and wildlife movement through the area is maintained and, where necessary, restored to provide for ecological integrity.
- This SIA is managed for wildlife movement and habitat connectivity and for the enjoyment of the public as they hunt, fish, recreate, learn about, and observe wildlife. Natural conditions prevail in the area while providing an opportunity for interpretation, education, and research.
- Wildlife habitat connectivity provides an essential ecological condition for supporting viable populations of at-risk species and offers educational and research opportunities.

³ See Lyon 1979; Van Dyke et al. 1986a, b; Fox 1989; Trombulak and Frissell 2000; Reed et al. 1996; Strittholt and DellaSala 2001; Davidson et al. 1996 for discussions of route density thresholds.

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- As possible, augment wildlife values through purchase from willing sellers, exchange, transfer, or donation of additional acreage of crucial wildlife habitat for their migration, movement and dispersal.
- Work with livestock permittees to identify fencing that is not critical for livestock operations. Remove fencing that is not critical for livestock operations and that is impeding wildlife movement. As possible, modify existing fencing that is not wildlife friendly.

C. Jim Creek Special Interest Area:

This 9,500-acre tract has native Rio Grande cutthroat trout. Protecting this area in the forest plan will ensure preservation and restoration of the Rio Grande cutthroat trout, which is a management priority.

Site-specific plan components and management approaches should include:

DESIRED CONDITIONS

- Long-term connectivity and integrity of habitat utilized for fish and wildlife movement through the area is maintained and, where necessary, restored to provide for ecological integrity.
- This SIA is managed for wildlife movement and habitat connectivity and for the enjoyment of the public as they hunt, fish, recreate, learn about, and observe wildlife. Natural conditions prevail in the area while providing an opportunity for interpretation, education, and research.
- Wildlife habitat connectivity provides an essential ecological condition for supporting viable populations of at-risk species and offers educational and research opportunities.
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D. Carnero Creek Special Interest Area:

This 42,800-acre area is being considered for special management due to its high-quality population of Rio Grande cutthroat trout. Designating this area in the forest plan will improve Rio Grande cutthroat trout habitat and ensure that species conservation is the management priority for the area.

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- This SIA is managed for wildlife movement and habitat connectivity and for the enjoyment of the public as they hunt, fish, recreate, learn about, and observe wildlife. Natural conditions prevail in the area while providing an opportunity for interpretation, education, and research.
- Wildlife habitat connectivity provides an essential ecological condition for supporting viable populations of at-risk species and offers educational and research opportunities.
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II. Continue to Engage in Cross Border/Cross Jurisdiction Collaboration

The management and prioritization of habitat connectivity across borders and jurisdictional boundaries has been an area of focus among federal agencies, state agencies, tribal entities and non-government organizations. The RGNF's recognition of the Spruce Hole/ Osier/Toltec Connectivity Special Interest Area and the Carson National Forest CNF recognition of the San Antonio Management Area (Fig.1)⁷ provide a unique opportunity for state and federal agencies to collaboratively manage for large scale Wildlife Connectivity across state borders and jurisdiction. These areas are important for regional scale wildlife connectivity and for numerous species of conservation concern and rare habitats. (DEIS at 314).

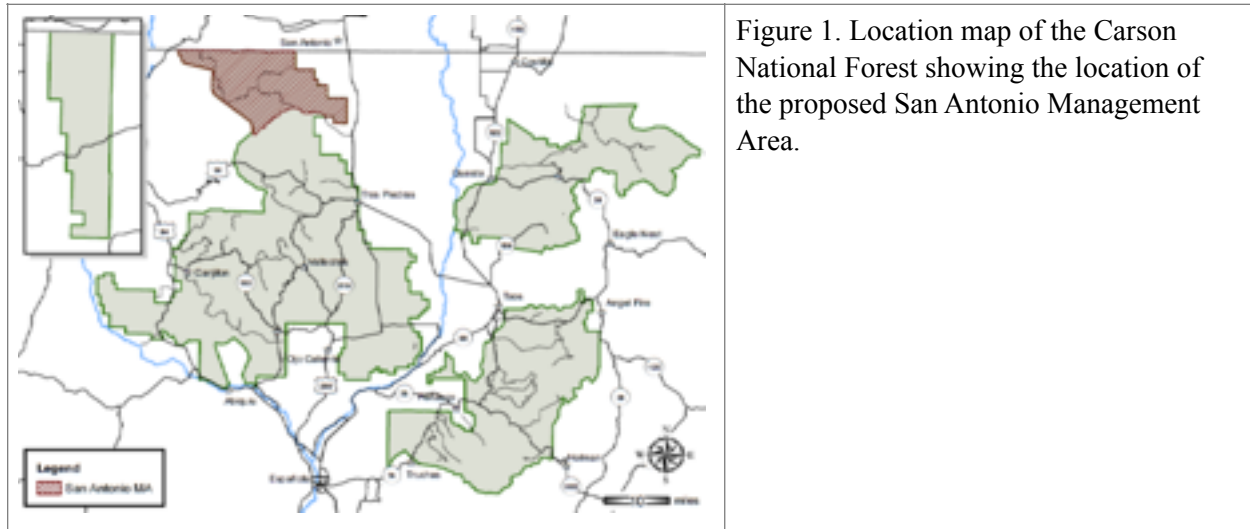
Designating the Spruce Hole/ Osier/Toltec Connectivity Special Interest Area would help achieve the 2012 planning rule's requirement to enhance ecosystem integrity. (See 36 CFR 219.8(a)(1) and 36 CFR 219.9). The area is adjacent to the 117,035-acre San Antonio Management Area proposed by the Carson National Forest in the December 2017 version of the Carson National Forest's Proposed Preliminary Draft Plan.⁸ (See Figure 1 showing the location of the proposed San Antonio Management Area.) As proposed, the San Antonio Management Area emphasizes the sustainability of wildlife and fish species by reducing barriers to movement and human disturbance, and the enjoyment of the area by the public for primitive and semi-primitive recreation and wildlife watching. Accordingly, designating the adjacent Spruce Hole/Osier/Toltec Special Interest Area would facilitate multi-scale management and enhance the diversity and resilience of the biological communities in this sub-region.

Furthermore, we encourage the RGNF to actively participate in the Upper Rio Grande Wildlife Connectivity Collaborative Working Group. This Collaborative working group has been created from an interest amongst non-government organizations, state agencies, federal agencies, tribal entities, elected officials and local communities focused on addressing wildlife connectivity within the Upper Rio Grande Watershed. The RGNF actively participated in the Colorado and New Mexico Natural Heritage Program's 2016 Wildlife Doorways Report and the National Wildlife Federation, Colorado Wildlife Federation and New Mexico Wildlife Federation 2017 Upper Rio Grande Wildlife Connectivity and Corridor Summit. These conferences were focused

⁷ See Proposed Preliminary Draft Land Management Plan for the Carson National Forest, Version 2 that is available at: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd566266.pdf. Pages 222-224.

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on increasing cross border, cross jurisdiction collaboration for managing wildlife connectivity and we want to encourage the RGNF to continue to participate in this important and unprecedented ongoing work.



III. Include Rocky Mountain Bighorn Sheep as a Species of Conservation Concern (SCC)

The U.S. Forest Service (USFS) and Rocky Mountain Bighorn Sheep (BHS) advocates have a shared interest in providing for persistence of wild sheep on the National Forests. Like elk and other important big game animals, BHS are integral to the National Forest System. Federal laws and Congressional Acts make conservation of bighorn sheep and their habitat on USFS lands a clear responsibility of the USFS.

Under the 2012 USFS planning rule, a species must be classified as a SCC if it meets two criteria: it must be known to occur in the area and the "the best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area." FSH 1909.12-10 Assessment direction in 12.55 provides: "The Interdisciplinary Team shall determine the status of at-risk species, by considering the existing plan direction, ecological conditions needed to support the species (sec. 12.53 of this Handbook), status of ecological conditions in the plan area (sec. 12.14c of this Handbook) and other relevant information."

Based upon the facts and science, we strongly urge that BHS be designated as a SCC in the RGNF. Substantial concern for BHS persistence and viability over the long-term in the RGNF is clearly documented. Making a SCC designation is critical because the coarse filter habitat components that apply for a sensitive species designation will not provide sufficient conditions required by the 2012 Planning Rule for BHS persistence in the RGNF. Three of the seven Data Analysis Units (DAUs) have experienced declining trends according to the 2016 data. DAU 11's Trickle Mountain herd had been one of the most productive in Colorado in the early 1990's with an estimated 500 sheep. The count for that herd now is only 35 animals. DAU 24 only has 30 BHS in Alamosa Canyon and 60 in Conejos Canyon. In DAU 26, Natural Arch/Canero Creek, only 15 bighorn sheep remain. The one thriving herd is the Sangre de Cristo in DAU 10, with more than 300 sheep according to Colorado Parks and Wildlife (CPW). We understand that the 2016 estimate of 360 animals has been revised downward for 2017 to 330.

We must disagree with the rationale for rejecting SCC status on page 527. Apparently the justification for rejecting SCC status is predicated upon the size of the Sangre de Cristo herd (see page 527). It is stated that CPW will manage hunting pressure and will provide for augmentation. This rationale is untenable as management of hunting pressure will not restore ecological conditions and CPW rarely engages in this practice because of concerns with novel pathogen movement. Further RGNF's own documents point out the vulnerability of most of the sheep populations in this forest.

Substantial concern for persistence, viability, over the long-term is clearly documented. The facts and science support the need to designate bighorn sheep as SCC on the Rio Grande National Forest. Failure to do so is contrary to the 2012 Planning Rule and USFS implementation guidance (FSM 1920 and FSH 1909.12).

Bighorn sheep have been designated as a USFS Sensitive Species in Regions 1-5 and portions of Region 6. The facts and science that support Sensitive Species designation have not changed. Those same facts and the best available science reinforce the need to designate BHS as SCC on many forests. Failure to do so would be contrary to the 2012 Planning Rule and USFS implementation guidance (FSM 1920 and FSH 1909.12).

Historically, BHS were well-distributed across the western United States (U.S.), numbering up to an estimated 2 million animals. Habitat loss, unregulated market hunting and disease resulted in extirpation of most U.S. populations. Efforts to re-establish populations have been ongoing since the early 1900s, with more than 22,000 bighorn sheep being transplanted in over 1,500 separate transplant actions.

Despite these efforts, die-offs continue. The status of the species remains tenuous, with fewer than 60,000 currently in the western U.S., often occurring in small, isolated herds. It has been well-established in the scientific literature that bacteria transmitted from domestic sheep results

in pneumonia-related all age die-offs within bighorn populations, followed by long-term suppression of lamb recruitment. These events are not uncommon.

All 14 public-land grazing states with bighorn sheep have experienced at least one bighorn sheep respiratory disease die-off in the last 14 years, and most have had numerous events. According to data compiled by the Western Association of Fish and Wildlife Agencies Wild Sheep Working Group (WAFWA WSWG), a total of 13,391 animals have been lost to these events since 1980. In addition, WAFWA WSWG estimates that as a result of these respiratory disease events, nearly 11,000 lambs born to surviving ewes died of pneumonia within a few months. The initial loss of adult animals is significant. However, it is ongoing depressed lamb recruitment in the years following respiratory disease events that impedes herd recovery and threatens persistence.

Areas managed by the USFS have historically provided ecological conditions essential to the persistence of native bighorn sheep. However, ongoing presence of domestic sheep on and adjacent to bighorn sheep habitat is a stressor that impairs NFS lands from providing the ecological conditions that bighorn sheep require. Based on strong scientific evidence, we believe there is substantial concern for the persistence of bighorn sheep over the long term. Consistent with stated USFS direction for selection of SCC, bighorn sheep meet the criteria for identifying species of conservation concern (FSH 1909.12 Chapter 10, 12.52c).

IV. Beavers

We want thank the RGNF for your inclusion of the presence of beavers as an indicator for watershed health, water resources and aquatic ecosystems, as stated in the proposed monitoring framework for Goal 1 identified in Table 13 starting on p. 97 of the Draft Revised Plan. We believe that beaver restoration opportunities are an important tool for improving watershed health in the face of changing climatic conditions, and we agree that their presence or absence is an essential indicator to identify areas that may benefit from restoration efforts.

V. Conclusion

We appreciate this opportunity to provide the Forest Service with our comments. Our intent here is to work cooperatively with the Forest Service and various agencies and community stakeholders to ensure that the RGNF is properly managed for the long-term public interest as well as for the benefit of Colorado and New Mexico's land, water, and wildlife.

We look forward to working with you as the forest plan revision process moves forward.

Sincerely,

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